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15 *Attorneys for Individual and Representative Plaintiffs*
16 *Cung Le, Nathan Quarry, Jon Fitch, Luis Javier*
17 *Vazquez, Brandon Vera, and Kyle Kingsbury*

18 *(Additional counsel appear on signature page)*

19 **IN THE UNITED STATES DISTRICT COURT**
20 **FOR THE DISTRICT OF NEVADA**

21 Cung Le, Nathan Quarry, and Jon Fitch, Brandon
22 Vera, Luis Javier Vazquez, and Kyle Kingsbury,
23 on behalf of themselves and all others similarly
24 situated,

25 Plaintiffs,

26 v.

27 Zuffa, LLC, d/b/a Ultimate Fighting
28 Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO
LODGE MATERIALS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule IA 10-5(a),
 2 and Section 14.3 of the Revised Stipulation and Protective Order (the “Protective Order”) issued in this
 3 action on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,
 4 Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others
 5 similarly situated (collectively, “Plaintiffs”) hereby move this Court for leave to lodge certain
 6 documents under seal related to Plaintiffs’ Consolidated Brief in Opposition to Defendant Zuffa, LLC’s
 7 Motion to Exclude the Testimony of Drs. Hal Singer and Andrew Zimbalist (ECF Nos. 522, 524) and
 8 Plaintiffs’ Brief in Opposition to Defendant Zuffa, LLC’s Motion to Exclude the Testimony of Guy A.
 9 Davis (ECF No. 517).

10 Under Section 14.3 of the Protective Order, documents designated Confidential or Highly
 11 Confidential – Attorneys’ Eyes Only “shall be provisionally lodged under seal with the Court, and
 12 redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the Court, the
 13 Party claiming protection shall file a motion to seal setting forth the bases for sealing and proper
 14 authority under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006), or some other
 15 applicable authority.” ECF No. 217 at 15.

16 The documents referenced below (or portions thereof) have been designated or refer to
 17 materials which have been designated Confidential or Highly Confidential – Attorneys’ Eyes Only by
 18 Defendant or third parties. Accordingly, Plaintiffs seek leave to lodge the following documents under
 19 seal.

20 First, Plaintiffs seek leave to lodge under seal Plaintiffs’ Consolidated Brief in Opposition to
 21 Defendant Zuffa, LLC’s Motion to Exclude the Testimony of Drs. Hal Singer and Andrew Zimbalist
 22 (ECF Nos. 522, 524).

23 Second, Plaintiffs seek leave to lodge under seal Plaintiffs’ Brief in Opposition to Defendant
 24 Zuffa, LLC’s Motion to Exclude the Testimony of Guy A. Davis (ECF No. 517).

25 Third, Plaintiffs seek leave to lodge under seal Exhibit 49 to the Declaration of Eric L. Cramer,
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1 Esq. (the “CD2”) (April 6, 2018)¹, which is a document entitled Supplemental Expert Report of Hal J.
 2 Singer, Ph.D., dated April 3, 2018.

3 Fourth, Plaintiffs seek leave to lodge under seal Exhibit 50 to CD2, which contains excerpts
 4 from the deposition of Joseph Silva, taken in this matter June 7, 2017.

5 Fifth, Plaintiffs seek leave to lodge under seal Exhibit 51 to CD2, which contains excerpts from
 6 the first deposition of Plaintiffs’ economist Andrew Zimbalist, Ph.D., taken in this matter on September
 7 25, 2017.

8 Sixth, Plaintiffs seek leave to lodge under seal Exhibit 52 to CD2, which contains excerpts from
 9 the first deposition of Plaintiffs’ economist Hal J. Singer, Ph.D., taken in this matter on September 27,
 10 2017.

11 Seventh, Plaintiffs seek leave to lodge under seal Exhibit 53 to CD2, which contains excerpts
 12 from the 30(b)(6) deposition of Robert Arum, taken in this matter on October 17, 2017.

13 Eighth, Plaintiffs seek leave to lodge under seal Exhibit 54 to CD2, which contains excerpts
 14 from the deposition of Zuffa’s accountant Elizabeth Kroger Davis, taken in this matter on November
 15 28, 2017.

16 Ninth, Plaintiffs seek leave to lodge under seal Exhibit 55 to CD2, which contains excerpts from
 17 the deposition of Zuffa’s economist Paul Oyer, taken in this matter on November 29, 2017.

18 Tenth, Plaintiffs seek leave to lodge under seal Exhibit 56 to CD2, which contains excerpts from
 19 the first day of the deposition of Zuffa’s economist Robert H. Topel, taken in this matter on December
 20 5-6, 2017.

21 Eleventh, Plaintiffs seek leave to lodge under seal Exhibit 57 to CD2, which contains excerpts
 22 from the second day of the deposition of Zuffa’s economist Robert H. Topel, taken in this matter on
 23 December 5-6, 2017.

24 Twelfth, Plaintiffs seek leave to lodge under seal Exhibit 59 to CD2, which contains excerpts
 25 from the second day of the deposition of Zuffa’s economist Robert D. Blair, taken in this matter on

27 ¹ Plaintiffs refer to the Declaration of Eric L. Cramer, Esq. dated April 6, 2018 as CD2 to distinguish
 28 from the Cramer Declaration dated February 16, 2018, ECF No. 518-1, submitted in conjunction with
 Plaintiffs’ Motion for Class Certification, ECF No. 518.

1 December 8-9, 2017.

2 Thirteenth, Plaintiffs seek leave to lodge under seal Exhibit 62 to CD2, which contains excerpts
3 from a document that Defendant produced in this litigation bearing the Bates label ZFL-0557588
4 through ZFL-0557599.

5 Fourteenth, Plaintiffs seek leave to lodge under seal Exhibit 63 to CD2, which contains excerpts
6 from a document that Defendant produced in this litigation bearing the Bates label ZFL-1055607
7 through ZFL-1055621.

8 Fifteenth, Plaintiffs seek leave to lodge under seal Exhibit 64 to CD2, which contains excerpts
9 from a document that Defendant produced in this litigation bearing the Bates label ZFL-1070290
10 through ZFL-1070334.

11 Sixteenth, Plaintiffs seek leave to lodge under seal Exhibit 65 to CD2, which is a document that
12 Defendant produced in this litigation bearing the Bates label ZFL-1081154 through ZFL-1081158.

13 Seventeenth, Plaintiffs seek leave to lodge under seal Exhibit 66 to CD2, which is a document
14 that Defendant produced in this litigation bearing the Bates label ZFL-1425511 through ZFL-1425518.

15 Eighteenth, Plaintiffs seek leave to lodge under seal Exhibit 67 to CD2, which is a document
16 that Defendant produced in this litigation bearing the Bates label ZFL-1872579.

17 Nineteenth, Plaintiffs seek leave to lodge under seal Exhibit 68 to CD2, which contains excerpts
18 from a document that Defendant produced in this litigation bearing the Bates label ZFL-2279086 to
19 ZFL-2279100.

20 Twentieth, Plaintiffs seek leave to lodge under seal Exhibit 69 to CD2, which is a document that
21 Defendant produced in this litigation bearing the Bates label ZFL-2497585 through ZFL-2497587.

22 Twenty-first, Plaintiffs seek leave to lodge under seal Exhibit 70 to CD2, which is a document
23 that Defendant produced in this litigation document bearing the Bates label ZFL-2536695.

24 Twenty-second, Plaintiffs seek leave to lodge under seal Exhibit 71 to CD2, which contains
25 excerpts from a document that WME-IMG produced in this litigation bearing the Bates label
26 WME_ZUFFA_00005368.

27 Twenty-third, Plaintiffs seek leave to lodge under seal Exhibit 84 to CD2, which is a document
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1 that Defendant produced in this litigation bearing the Bates label ZUF-00113209 through ZUF-
2 00113217.

3 Twenty-fourth, Plaintiffs seek leave to lodge under seal Exhibit 85 to CD2, which is a document
4 that Defendant produced in this litigation bearing the Bates label ZFL-1484034 through ZFL-1484037.

5 Plaintiffs have filed all of these documents under seal, in accordance with the Court's ECF
6 system, with the instant motion. Plaintiffs have publicly filed placeholders for or redacted versions of
7 these documents with the Court, and will serve un-redacted versions of these documents on Defendant,
8 in accordance with LR IC 4-1(c)(4).

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1 Dated: April 6, 2018

Respectfully Submitted,

2 By: /s/ Eric L. Cramer
3 Eric L. Cramer

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of April, 2018 a true and correct copy of **PLAINTIFFS' MOTION FOR LEAVE TO LODGE MATERIALS UNDER SEAL** was served via the Court's CM/ECF system on all parties or persons requiring notice.

/s/ Eric L. Cramer
Eric L. Cramer